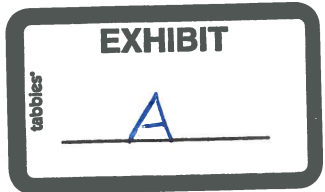




214 SB 8-11 Return

IN THE 31ST JUDICIAL CIRCUIT, GREENE COUNTY, MISSOURI



Judge or Division: JASON R BROWN	Case Number: 1831-CC00941
Plaintiff/Petitioner: SUSAN POHLENZ	Plaintiff's/Petitioner's Attorney/Address CHRISTINA S BERRY P O BOX 127 ST JOSEPH, MO 64502-0127
Defendant/Respondent: JNJ EXPRESS INC	Court Address: JUDICIAL COURTS FACILITY 1010 N BOONVILLE AVE SPRINGFIELD, MO 65802
Nature of Suit: CC Pers Injury-Vehicular	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: JNJ EXPRESS INC
Alias:

RA: JOSEPH REBMAN
165 N MERAMEC AVE STE 310
ST. LOUIS, MO 63105
COURT SEAL OF



GREENE COUNTY

22 RINEW

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

07/12/2018
Date

/S/ THOMAS R BARR BY CB
Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to:

JOE (name) WAGER (title).
☐ other: _____

Served at 165 N MERAMEC (address)
 in ST. LOUIS (County/City of St. Louis), MO, on 7/25/18 (date) at 9 A (time).

William Rinehart

Deputy Sheriff

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



ALACHUA COUNTY SHERIFF'S OFFICE
ALACHUA COUNTY, FLORIDA



NON-ENFORCEABLE RETURN OF SERVICE

Document Number: ASO18CIV009420NON

Agency Number:

Court: OTHER

County: GREENE COUNTY, MO

Case Number: 1831CC00941

Attorney/Agent:

MONTEE LAW FIRM

PO BOX 127

ST JOSEPH, MO 64502

Plaintiff: SUSAN POHLENZ

Defendant: JNJ EXPRESS INC

Type of Process: SUMMONS FOR PERSONAL SERVICE OUTSIDE THE STATE OF MISSOURI, PETITION FOR DAMAGES, CERTIFICATE OF SERVICE, OPENING INTERROGATORIES, MEDIA IN ENVELOPE

INDIVIDUAL - PERSONAL SERVICE

PERSON TO BE SERVED: GRAHAM, WARREN
1945 NW 21ST ST , GAINESVILLE, FL

Received the above named writ on 7/20/2018 at 10:20 AM, and served the same on 7/23/2018 at 12:20 PM, in Alachua County, Florida, by delivering a true copy of this writ together with a copy of the initial pleading, if any, with the date and hour of service endorsed thereon by me, to: GRAHAM, WARREN after the provisions as set forth in Section 48.031(1)(a), Florida Statutes have been met.

SADIE DARNELL
ALACHUA

By: 
K. MODICAN, 297

Service Fee: \$40.00

Receipt No: 54521-18-D

Printed By: PCBALDWI



THE 31ST JUDICIAL CIRCUIT COURT, GREENE COUNTY, MISSOURI

Return
9480

Judge Division: JASON BROWN	Case Number: 1831-CC00941
Plaintiff/Petitioner: SUSAN HLENZ	Plaintiff's/Petitioner's Attorney/Address: CHRISTINA S BERRY P O BOX 127 ST JOSEPH, MO 64502-0127
Defendant/Respondent: JNJ EXPRESS INC	Court Address: JUDICIAL COURTS FACILITY 1010 N BOONVILLE AVE SPRINGFIELD, MO 65802
Nature of Suit: CC Pers Injury-Vehicular	

(Date File Stamp)

Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)

The State of Missouri to: **WARREN GRAHAM**
Alias:
1945 NW 23rd ST
GAINSVILLE, FL 32605

COURT OF



GREENE COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

07/12/2018

Date

/S/ THOMAS R BARR BY CB

Clerk

Further Information:

Officer's or Server's Affidavit of Service

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is _____ of _____ County, _____ (state).
- I have served the above summons by: (check one)
 - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____, a person of the Defendant's/Respondent's family over the age of 15 years.
 - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).
 - ☐ other (describe) _____

Served at _____
in _____ County, _____ (state), on _____ (date) at _____ (address)
_____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and Sworn To me before this _____ (day) _____ (month) _____ (year)

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Service Fees, if applicable

Summons \$ _____
Non Est \$ _____
Mileage \$ _____ (_____ miles @ \$ _____ per mile)
Total \$ _____

See the following page for directions to clerk and to officer making return on service of summons.

Signature and Title

ALACHUA COUNTY
SHERIFF'S OFFICE

2018 JUL 20 AM 10:16

CIVIL BUREAU




IN THE 31ST JUDICIAL CIRCUIT COURT, GREENE COUNTY, MISSOURI

Judge or Division: JASON R BROWN	Case Number: 1831-CC00941
Plaintiff/Petitioner: SUSAN POHLENZ	Plaintiff's/Petitioner's Attorney/Address: CHRISTINA S BERRY P O BOX 127 ST JOSEPH, MO 64502-0127
Defendant/Respondent: JNJ EXPRESS INC	Court Address: JUDICIAL COURTS FACILITY 1010 N BOONVILLE AVE SPRINGFIELD, MO 65802
Nature of Suit: CC Pers Injury-Vehicular	

(Date File Stamp)

**Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)**

The State of Missouri to: WARREN GRAHAM Alias: 1945 NW 21ST ST GAINSVILLE, FL 32605	
 COURT SEAL OF GREENE COUNTY	You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action. <div style="display: flex; justify-content: space-between;"> <div> <u>07/12/2018</u> Date </div> <div> <u>/S/ THOMAS R BARR BY CB</u> Clerk </div> </div>
Officer's or Server's Affidavit of Service	
I certify that: 1. I am authorized to serve process in civil actions within the state or territory where the above summons was served. 2. My official title is _____ of _____ County, _____ (state). 3. I have served the above summons by: (check one) <input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the Defendant/Respondent. <input type="checkbox"/> leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____, a person of the Defendant's/Respondent's family over the age of 15 years. <input type="checkbox"/> (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title). <input type="checkbox"/> other (describe) _____ Served at _____ (address) in _____ County, _____ (state), on _____ (date) at _____ (time). <div style="display: flex; justify-content: space-between;"> <div> Printed Name of Sheriff or Server _____ </div> <div> Signature of Sheriff or Server _____ </div> </div> <div style="display: flex; justify-content: space-between;"> <div> (Seal) Subscribed and Sworn To me before this _____ (day) _____ (month) _____ (year) I am: (check one) <input type="checkbox"/> the clerk of the court of which affiant is an officer. <input type="checkbox"/> the judge of the court of which affiant is an officer. <input type="checkbox"/> authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer) <input type="checkbox"/> authorized to administer oaths. (use for court-appointed server) </div> <div> Signature and Title _____ </div> </div>	
Service Fees, if applicable Summons \$ _____ Non Est \$ _____ Mileage \$ _____ (_____ miles @ \$ _____ per mile) Total \$ _____	
See the following page for directions to clerk and to officer making return on service of summons.	

Directions to Clerk

Personal service outside the State of Missouri is permitted only upon certain conditions set forth in Rule 54. The clerk should insert in the summons the names of only the Defendant/Respondent or Defendants/Respondents who are to be personally served by the officer to whom the summons is delivered. The summons should be signed by the clerk or deputy clerk under the seal of the court and a copy of the summons and a copy of the petition for each Defendant/Respondent should be mailed along with the original summons to the officer who is to make service. The copy of the summons may be a carbon or other copy and should be signed and sealed in the same manner as the original but it is unnecessary to certify that the copy is a true copy. The copy of the motion may be a carbon or other copy and should be securely attached to the copy of the summons but need not be certified a true copy. If the Plaintiff's/Petitioner has no attorney, the Plaintiff's/Petitioner's address and telephone number should be stated in the appropriate square on the summons. This form is not for use in attachment actions. (See Rule 54.06, 54.07 and 54.14)

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must not be made less than ten days nor more than 30 days from the date the Defendant/Respondent is to appear in court. The return should be made promptly and in any event so that it will reach the Missouri Court within 30 days after service.




IN THE 31ST JUDICIAL CIRCUIT, GREENE COUNTY, MISSOURI

Judge or Division: JASON R BROWN	Case Number: 1831-CC00941
Plaintiff/Petitioner: SUSAN POHLENZ	Plaintiff's/Petitioner's Attorney/Address CHRISTINA S BERRY P O BOX 127 ST JOSEPH, MO 64502-0127
Defendant/Respondent: JNJ EXPRESS INC	Court Address: JUDICIAL COURTS FACILITY 1010 N BOONVILLE AVE SPRINGFIELD, MO 65802
Nature of Suit: CC Pers Injury-Vehicular	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: JNJ EXPRESS INC Alias: RA: JOSEPH REBMAN 165 N MERAMEC AVE STE 310 ST. LOUIS, MO 63105 COURT SEAL OF  GREENE COUNTY		You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.
07/12/2018 Date	/S/ THOMAS R BARR BY CB Clerk	
Further Information:		

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).
- ☐ other: _____.

Served at _____ (address)
 in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

 Printed Name of Sheriff or Server

 Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$._____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

SUSAN POHLENZ

And

ROBERT POHLENZ

Plaintiff,

v.

JNJ EXPRESS, INC.

And

WARREN GRAHAM

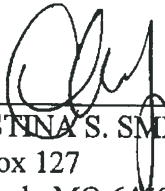
Defendants.

Case No.:

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original and two copies of Plaintiff's Opening Interrogatories to Defendant Warren Graham, Plaintiff's First Request for Production of Documents to Defendant, a diskette containing copies of the afore-said request for production and a copy of this Certificate of Service were served upon Defendant concurrently with service of the Petition for Damages.

Respectfully submitted,

MONTEE LAW FIRM, P.C.

 CHRISTINA S. SMITH, #49898

P.O. Box 127

St. Joseph, MO 64502

(816) 364-1650 Phone

(816) 364-1509 Fax

christie_smith37@hotmail.com

ATTORNEYS FOR PLAINTIFF

IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

SUSAN POHLENZ

And

ROBERT POHLENZ

Plaintiff,

v.

JNJ EXPRESS, INC.

And

WARREN GRAHAM

Defendants.

Case No.:

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original and two copies of Plaintiff's Opening Interrogatories to Defendant JNJ Express, Inc., Plaintiff's First Request for Production of Documents to Defendant, a diskette containing copies of the afore-said request for production and a copy of this Certificate of Service were served upon Defendant concurrently with service of the Petition for Damages.

Respectfully submitted,

MONTEE LAW FIRM, P.C.

 CHRISTINA S. SMITH, #49898

P.O. Box 127

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(816) 364-1650 Phone

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christie_smith37@hotmail.com

ATTORNEYS FOR PLAINTIFF

IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

SUSAN POHLENZ

And

ROBERT POHLENZ

Plaintiff,

v.

JNJ EXPRESS, INC.

And

WARREN GRAHAM

Defendants.

Case No.:

DESIGNATION OF LEAD ATTORNEY

COMES NOW Plaintiffs by and through their attorney of record, the Montee Law Firm, P.C, and designates Christina S. Smith as the lead attorney in the above referenced matter.

Respectfully submitted,

MONTEE LAW FIRM, P.C.

 CHRISTINA S. SMITH, #49898

P.O. Box 127

St. Joseph, MO 64502

(816) 364-1650 Phone

(816) 364-1509 Fax

christie_smith37@hotmail.com

ATTORNEYS FOR PLAINTIFF

IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

SUSAN POHLENZ
 3420 NE Akin Blvd. Apt. 226
 Lee's Summit, MO 64064

And

ROBERT POHLENZ
 3420 NE Akin Blvd. Apt. 226
 Lee's Summit, MO 64064

Plaintiffs,

v.

Case No.:

JNJ EXPRESS, INC.
 SERVE: R.A. Joseph Rebman
 165 North Meramec Ave
 Suite 310
 St. Louis, MO 63105

And

WARREN GRAHAM
 1945 NW 21st Street
 Gainesville, FL 32605,

Defendants.

PETITION FOR DAMAGES

COMES NOW Plaintiffs Susan and Robert Pohlenz, by and through their attorney Christina S. Smith and the Montee Law Firm, P.C., and, for their cause of action against Defendants JNJ Express, Inc. and Warren Graham, jointly and severally, states and alleges the following:

ALLEGATIONS COMMON TO ALL COUNTS

1. This cause of action accrued in Greene County, Missouri.

2. Plaintiff Susan Pohlenz is an individual residing in Lee's Summit, Jackson County, Missouri.
3. Plaintiff Robert Pohlenz is an individual residing in Lee's Summit, Jackson County, Missouri.
4. Defendant JNJ Express, Inc. (hereinafter referred to as "Defendant JNJ Express") was and still is a foreign corporation duly organized and existing under and by virtue of the laws of the State of Tennessee, doing business throughout the United States including but not limited to the State of Missouri. Defendant JNJ Express' principal place of business is 3935 Old Getwell Road, Memphis, TN 38118, and its agent can be served at the address noted in the caption above.
5. Defendant Warren Graham is an individual residing in Gainesville, Alachua County, Florida and can be served at the address noted in the caption above.
6. At all times relevant to this action, including on or about September 5, 2016, Defendant Graham was an employee of and/or an agent for Defendant JNJ Express, and Defendant Graham was either acting within the course and scope of his employment with Defendant JNJ Express or acting to advance the business interest of Defendant JNJ Express; accordingly, Defendant JNJ Express is vicariously liable for the tortious acts and/or omissions of its employee and/or agent Defendant Graham via the legal doctrine of *Respondeat Superior*.
7. Based on information and belief, at all times relevant to this action Defendant JNJ Express was the owner of a certain 2016 International Harvester Conventional semi-truck being driven by Defendant Graham at the time of the subject accident, bearing Tennessee license plate number A7893HY, in use commercially, for hire, servicing the business

interests of Defendant JNJ Express, i.e. carrying merchandise to and from various locations for profit.

8. Based on information and belief, at all times relevant to this action the 2016 International Harvester Conventional semi-truck being driven by Defendant Graham at the time of the subject accident was placarded with a USDOT number 655796 that was registered to Defendant JNJ Express.
9. At all times relevant to this action, including on or about September 5, 2016, the 2016 International Harvester Conventional semi-truck was operated by Defendant Graham and used with the knowledge, permission and consent, either expressed or implied, of Defendant JNJ Express.
10. At all times relevant to this action, including on or about September 5, 2016, the 2016 International Harvester Conventional semi-truck was operated by Defendant Graham for the business interests of Defendant JNJ Express.
11. On or about September 5, 2016 at approximately 8:10 a.m., Plaintiff Susan Pohlenz was operating a 2015 Ford going northbound on Schoolcraft Freeway north of Chestnut Expressway in the farthest outside lane in Springfield, Greene County, Missouri.
12. At said time and place, Plaintiff Robert Pohlenz was a passenger in the 2015 Ford being operated by Plaintiff Susan Pohlenz.
13. At said time and place, Defendant Graham, while in the course and scope of his employment and/or agency with Defendant JNJ Express and while operating Defendant JNJ Express' 2016 International Harvester Conventional semi-truck, also going northbound on Schoolcraft Freeway when he came into the lane of the Plaintiff's vehicle and struck the side causing it to spin across the front of the 2016 International Harvester

Conventional semi-truck and the inner northbound lanes prior to striking the concrete barrier separating the northbound and southbound lanes.

14. Defendant Graham, while in the course and scope of his employment and/or agency with Defendant JNJ Express, failed to exercise the highest degree of care in the operation of the 2016 International Harvester Conventional truck in one or more of the following particulars:
 - a. Defendant Graham failed to keep a careful lookout; and/or
 - b. Defendant Graham was driving at an excessive speed for the conditions; and/or
 - c. Defendant Graham failed to yield the right-of-way; and/or
 - d. Defendant Graham drove at a speed which made it impossible for him to stop within the range of his visibility; and/or
 - e. Defendant Graham made an improper lane change; and/or
 - f. Defendant Graham knew or by the use of the highest degree of care could have known that there was a reasonable likelihood of collision in time thereafter to have stopped, swerved, slackened speed, sounded a warning, slackened speed and swerved, slackened speed and sounded a warning, or swerved and sounded a warning and failed to do so; and/or
 - f. Defendant Graham's 2016 International Harvester Conventional semi-truck struck Plaintiffs' vehicle, and Defendant Graham was thereby negligent.

COUNT I – NEGLIGENCE

Plaintiff Susan Pohlenz v. Defendant Warren Graham & Defendant JNJ Express, Inc.

15. Plaintiffs incorporate into Count I, by reference, each and every allegation set forth within paragraphs one (1) through fourteen (14) above as though fully stated herein.

16. As a direct and proximate result of the negligence of Defendant JNJ Express and/or Defendant Graham as described above, Plaintiff Susan Pohlenz suffered the following permanent, progressive and disabling injuries: cervical strain/sprain, thoracic strain/sprain, lumbosacral strain/sprain, bilateral shoulder strain/sprain, left knee effusion, left knee meniscus tear, and otherwise made sore and lame; she was forced to undergo a painful and invasive left knee meniscus repair surgery; and she has suffered and will in the future suffer great pain and anguish; she has incurred, and will in future incur substantial expense for medical attention; and she has lost wages, all to her damage in an amount in excess of **Twenty-Five Thousand and 00/100 Dollars (\$25,000.00)**.

WHEREFORE, Plaintiff Susan Pohlenz prays for judgment against Defendants JNJ Express, Inc. and Warren Graham, jointly and severally, in an amount in excess of \$25,000.00, for her costs and expenses incurred, and for such other relief as the Court deems just and proper.

COUNT II – NEGLIGENCE

Plaintiff Robert Pohlenz v. Defendant Warren Graham & Defendant JNJ Express, Inc.

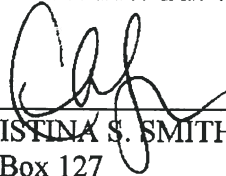
17. Plaintiffs incorporate into Count II, by reference, each and every allegation set forth within paragraphs one (1) through sixteen (16) above as though fully stated herein.
18. As a direct and proximate result of the negligence of Defendant JNJ Express and/or Defendant Graham as described above, Plaintiff Robert Pohlenz suffered the following permanent, progressive and disabling injuries: cervicgia, pain in right hip, right shoulder strain/sprain, thoracic strain/sprain, stiffness and muscle aches throughout joints, and otherwise made sore and lame; and he has suffered and will in the future suffer great pain and anguish; he has incurred, and will in future incur substantial expense for medical

attention; and he has lost wages, all to his damage in an amount in excess of **Twenty-Five Thousand and 00/100 Dollars (\$25,000.00).**

WHEREFORE, Plaintiff Robert Pohlenz prays for judgment against Defendants JNJ Express, Inc. and Warren Graham, jointly and severally, in an amount in excess of \$25,000.00, for her costs and expenses incurred, and for such other relief as the Court deems just and proper.

Respectfully submitted,

MONTEE LAW FIRM, P.C.



CHRISTINA S. SMITH, #49898

P.O. Box 127

St. Joseph, MO 64502

(816) 364-1650 Phone

(816) 364-1509 Fax

christie_smith37@hotmail.com

ATTORNEYS FOR PLAINTIFF